

EDWARD E. COREY (SB #124900)  
COREY & COREY

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Counsel for SHANGHAI WIN-WING IMP. &  
EXP. CO, LTD., Plaintiff.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SHANGHAI WIN-WING IMP. &  
EXP. CO, LTD.,

Plaintiff,

vs.

TETSUYA WATANABE, OAKHILLS HARDWOOD  
FLOORS, INC., K&T ASSOCIATES, INC.

Defendants.

No. 08-CV-02031-SC

**EX PARTE APPLICATION TO  
CONTINUE CASE MANAGEMENT  
CONFERENCE**

Now comes Plaintiff Shanghai Win-Wing Imp. & Exp. Co., by and  
through counsel, and moves this Court for an Order continuing the Case  
Management Conference scheduled for September 19, 2008 at 10:00 A.M.


Plaintiff has submitted concurrently with this application to  
continue an application for default judgment in this matter which will  
dispose of this matter in entirety. The Court has scheduled the  
Application for Default Judgment for November 7, 2008 at 10:00 A.M.  
which is after the scheduled Case Management Conference. Declaration  
of Edward E. Corey, ¶1.

1 Plaintiff and its counsel suggest that given the scheduled  
2 Default Application which will likely dispose of the entire action, it  
3 would be more efficient if the Case Management Conference was  
4 continued to a date beyond the currently scheduled Application for  
5 Default. Declaration of Edward E. Corey, ¶ 2. There would be nothing  
6 to report at the Case Management Conference other than the facts as  
7 stated herein. Declaration of Edward E. Corey, ¶ 3. If the Default  
8 Judgment is granted as applied for, the Case Management Conference  
9 would be moot. Declaration of Edward E. Corey, ¶ 4.

10 As such, Plaintiff moves the Court for a continuance of the Case  
11 Management Conference to date beyond the scheduled application for  
12 default judgment of November 7, 2008.

13  
14 Dated: September 3, 2008

COREY & COREY

15   
16 By: Edward E. Corey  
17 Attorneys for Plaintiff  
18 Shanghai Win-Wing Imp. & Exp.  
Co., Ltd.

19 **ORDER**

20 Upon good cause showing, the Case Management Conference  
21 scheduled in this matter in continued to \_\_\_\_\_, 2008 at  
10:00 A.M.

22 It is so ordered.

23  
24 JUDGE SAMUEL CONTI

**DECLARATION OF EDWARD COREY**

I, Edward E. Corey, am counsel of record for the Plaintiff in this matter and have personal knowledge of the facts set forth below. If called upon as a witness, I would competently testify as follows:

1. Plaintiff has submitted concurrently with this application to continue an application for default judgment in this matter which will dispose of this matter in entirety. The Court has scheduled the Application for Default Judgment for November 7, 2008 at 10:00 A.M. which is after the scheduled Case Management Conference.

2. Plaintiff and its counsel suggest that given the scheduled Default Application which will likely dispose of the entire action, it would be more efficient if the Case Management Conference was continued to a date beyond the currently scheduled Application for Default.

3. There would be nothing to report at the Case Management Conference other than the facts as stated herein.

4. If the Default Judgment is granted as applied for, the Case Management Conference would be moot.

I declare under the penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed this 3<sup>rd</sup> day of September, 2008 at Los Angeles, California.

  
Edward E. Corey, Declarant.

**EDWARD E. COREY (SB #124900)**  
**COREY & COREY**

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Counsel for SHANGHAI WIN-WING IMP. &  
EXP. CO, LTD., Plaintiff.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

SHANGHAI WIN-WING IMP. & EXP. CO, LTD.,	)	No. 08-CV-02031-SC
	)	
Plaintiff,	)	
vs.	)	<b>ORDER ON PLAINTIFF'S EX</b>
	)	<b>PARTE APPLICATION TO</b>
	)	<b>CONTINUE SEPTEMBER 19, 2008</b>
	)	<b>CASE MANAGEMENT CONFERENCE</b>
TETSUYA WATANABE, OAKHILLS HARDWOOD FLOORS, INC., K&T ASSOCIATES, INC.	)	<b>AND ADR DEADLINES</b>
	)	
Defendants.	)	
_____	)	

Upon review of Plaintiff's Motion for Continuing the Order of April 18, 2008, Settling Initial Case Management Conference and ADR Deadlines, and for good cause shown, said deadlines are continued pending further Order of the Court.

It is so ordered.

\_\_\_\_\_  
Judge Hon. Samuel Conti